

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: WILLIAM HARVEY GOODLING and : CHAPTER 13
KELLY JEAN GOODLING :
Debtors :
 :
JACK N. ZAHAROPOULOS :
STANDING CHAPTER 13 TRUSTEE :
Movant :
 :
vs. :
 :
WILLIAM HARVEY GOODLING and :
KELLY JEAN GOODLING :
Respondents : CASE NO. 1-21-bk-01819

TRUSTEE'S OBJECTION TO AMENDED CHAPTER 13 PLAN

AND NOW, this 21st day of December, 2021, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s):

1. Trustee avers that debtors' plan is not feasible and cannot be administered due to the lack of the following:

a. Last paystub dated November, 2021. (Second request)

2. The Trustee avers that debtors' plan is not feasible based on the following:

- a. Insufficient Monthly Net Income as indicated on Schedules I and J. (Monthly Net Income is \$603.83.)
- b. Unfunded lump sum payment in month 60.

WHEREFORE, Trustee alleges and avers that debtors' plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

BY: /s/James K. Jones

CERTIFICATE OF SERVICE

AND NOW, this 21st day of December, 2021, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Kara Gendron, Esquire
125 State Street
Harrisburg, PA 17101

/s/Deborah A. Behney
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee